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Attorneys for Respondents

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Hassan Nassiri,

Petitioner,

V.

Chad F. Wolf, in his official capacity as
Acting Secretary of Homeland Security,
et al.

Respondents.

Case No: 2:20-cv-00194-APG-NJK

Stipulation and Order

WHEREAS,

Petitioner commenced this proceeding to request that the Court reopen Petitioner's naturalization and issue or order the issuance of an amended Certificate of Naturalization with a corrected date of birth; and

Respondents' position is that factual circumstances and applicable regulations precluded Respondents' U.S. Citizen and Immigration Services from changing Petitioner's date of birth, but Respondents do not object to Petitioner's request for an order from the Court directing such change in date of birth;

1 NOW THEREFORE, Petitioner and Respondents, through undersigned counsel,
2 stipulate to, and request that the Court, by signing below, direct Respondents' U.S. Citizen
3 and Immigration Services to issue to Petitioner an amended certificate of naturalization
4 that contains and reflects Petitioner's date of birth as March 17, 1947.

5 Upon the issuance of such amended certificate of naturalization, the parties shall
6 promptly file a stipulation and order for dismissal, each party to bear its own costs and
7 attorneys' fees.

8 In the meantime, the due date for Respondents to otherwise file a response to the
9 Petition (ECF No. 1) is extended by 60 days from May 6, 2020 to July 6, 2020.

10 Respectfully submitted this 21st day of April 2020.

11 REZA ATHARI & ASSOCIATES

12
13 /s/ Luther Snavely
14 LUTHER SNAVELY, ESQ.
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15 3365 Pepper Lane, Suite 102
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16 *Attorney for Petitioner*

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Patrick Rose
PATRICK A. ROSE
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Attorneys for Respondents

17 IT IS SO ORDERED:
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19
20 
UNITED STATES DISTRICT JUDGE

21 4/21/2020

22 DATED: _____